

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,           )  
Plaintiff,   )  
v.   ) Misc. No. 17-151-LPS  
BOLIVARIAN REPUBLIC OF VENEZUELA, )  
Defendant.   )

**RED TREE INVESTMENTS, LLC,** )  
 )  
**Plaintiff,** )  
 )  
**v.** ) Misc. Nos. 22-68-LPS & 22-69-LPS  
 )  
**PETRÓLEOS DE VENEZUELA, S.A.,** )  
**and PDVSA PETRÓLEO, S.A.,** )  
 )  
**Defendants.** )

CONTRARIAN CAPITAL MANAGEMENT, )  
L.L.C., et al., )  
  
Plaintiffs, ) Misc. Nos. 21-18-LPS, 22-131-LPS & 22-  
263-LPS  
  
v. )  
  
BOLIVARIAN REPUBLIC OF VENEZUELA, )  
  
Defendant. )

OI EUROPEAN GROUP B.V., )  
 Plaintiff, )  
 v. ) Misc. No. 19-290-LPS  
 BOLIVARIAN REPUBLIC OF VENEZUELA, )  
 Defendant. )

ACL1 INVESTMENTS LTD., ACL2 )  
INVESTMENTS LTD., and LDO (CAYMAN) )  
XVIII LTD., )  
Plaintiffs, )  
v. ) Misc. No. 21-46-LPS  
BOLIVARIAN REPUBLIC OF VENEZUELA, )  
Defendant. )

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RUSORO MINING LIMITED, )  
Plaintiff, )  
v. ) Misc. No. 21-481-LPS  
BOLIVARIAN REPUBLIC OF VENEZUELA, )  
Defendant. )

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TIDEWATER INVESTMENT SRL and )  
TIDEWATER CARIBE S.A., )  
Plaintiffs, )  
v. ) Misc. No. 19-79-LPS  
BOLIVARIAN REPUBLIC OF VENEZUELA, )  
Defendant. )

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PHILLIPS PETROLEUM COMPANY )  
VENEZUELA LIMITED and )  
CONOCOPHILLIPS PETROZUATA B.V., )  
Plaintiffs, )  
v. ) Misc. No. 19-342-LPS  
PETRÓLEOS DE VENEZUELA, S.A., )  
CORPOGUANIPA, S.A., and PDVSA )  
PETRÓLEO, S.A., )  
Defendants. )

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NORTHROP GRUMMAN SHIP SYSTEMS, )  
INC., )  
Plaintiff, )  
v. ) Misc. No. 20-257-LPS  
THE MINISTRY OF DEFENSE OF THE )  
REPUBLIC OF VENEZUELA, )  
Defendant. )  
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CONOCOPHILLIPS GULF OF PARIA B.V., )  
Plaintiff, )  
v. ) Misc. No. 22-264-LPS  
CORPORACIÓN VENEZOLANA DEL )  
PETRÓLEO, S.A., and PETRÓLEOS DE )  
VENEZUELA, S.A., )  
Defendants. )  
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KOCH MINERALS SÀRL and KOCH )  
NITROGEN INTERNATIONAL SÀRL, )  
Plaintiffs, )  
v. ) Misc. No. 22-156-LPS  
BOLIVARIAN REPUBLIC OF VENEZUELA, )  
Defendant. )  
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GOLD RESERVE INC., )  
Plaintiff, )  
v. ) Misc. No. 22-453-LPS  
BOLIVARIAN REPUBLIC OF VENEZUELA, )  
Defendant. )

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SIEMENS ENERGY, INC., )  
Plaintiff, )  
v. ) Misc. No. 22-347-LPS  
PETROLEOS DE VENEZUELA, S.A. )  
Defendant. )  
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VALORES MUNDIALES, S.L. and )  
CONSORCIO ANDINO, S.L., )  
Plaintiffs, )  
v. ) Misc. No. 23-298-LPS  
BOLIVARIAN REPUBLIC OF VENEZUELA, )  
Defendant. )  
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CONOCOPHILLIPS PETROZUATA B.V., )  
CONOCOPHILLIPS HAMACA B.V., )  
CONOCOPHILLIPS GULF OF PARIA B.V., )  
and CONOCOPHILLIPS COMPANY, )  
Plaintiffs, )  
v. ) Misc. No. 22-464-LPS  
BOLIVARIAN REPUBLIC OF VENEZUELA, )  
Defendant. )  
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PHARO GAIA FUND LTD. and PHARO )  
MACRO FUND LTD., )  
Plaintiffs, )  
v. ) Misc. No. 23-360-LPS  
BOLIVARIAN REPUBLIC OF VENEZUELA, )  
Defendant. )

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PHARO GAIA FUND LTD., PHARO MACRO )  
FUND LTD., and PHARO TRADING FUND, )  
LTD., )  
Plaintiffs, )  
v. ) Misc. No. 23-361-LPS  
BOLIVARIAN REPUBLIC OF VENEZUELA, )  
Defendant. )  
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RUDI LOVATI and ALESSANDRO )  
LUCIBELLO PIANI, )  
Plaintiffs, )  
v. ) Misc. No. 23-340-LPS  
BOLIVARIAN REPUBLIC OF VENEZUELA, )  
Defendant. )  
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GRAMERCY DISTRESSED OPPORTUNITY )  
FUND LLC, )  
Plaintiff, )  
v. ) Misc. Nos. 23-378-LPS & 23-379-LPS  
BOLIVARIAN REPUBLIC OF VENEZUELA, )  
Defendant. )  
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SAINT-GOBAIN PERFORMANCE )  
PLASTICS EUROPE, )  
Plaintiff, )  
v. ) Misc. No. 23-397-LPS  
BOLIVARIAN REPUBLIC OF VENEZUELA, )  
Defendant. )

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ALTANA CREDIT OPPORTUNITIES FUND	)	
SPC. ALTANA CREDIT OPPORTUNITIES	)	
FUND 1 SP. and ALTANA FUNDS LTD.	)	
CAYMAN.	)	
Plaintiffs.	)	
v.	)	Misc. No. 23-608-LPS
BOLIVARIAN REPUBLIC OF VENEZUELA.	)	
Defendant.	)	

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### WRIT ORDER

WHEREAS, on May 1, 2023, the Office of Foreign Assets Control (“OFAC”) issued a license (No. VENEZUELA-EO13884-2023-1057131-1) to the Clerk of the Court (the “Clerk”) (*see* D.I. 555),<sup>1</sup> authorizing the issuance and service of writs of attachment *feri facias* granted by the Court against the PDV Holding, Inc. (“PDVH”) shares owned by Petróleos de Venezuela, S.A. (“PDVSA”) for any party named an “Additional Judgment Creditor” by the Court pursuant to the Sale Procedures Order (*see* D.I. 481);

WHEREAS, on July 27, 2023, the Court issued a *Memorandum Order* (the “July 27 Order”) (D.I. 646) outlining the steps that judgment holders must complete in order to participate in the Marketing Process;

WHEREAS, on October 11, 2023, the Court issued a *Memorandum Order* (D.I. 738) adopting the Special Master’s recommendations for procedures implementing the priority arrangement (the “Priority Arrangement Procedures”) as set forth in the Joint Status Report, dated August 24, 2023 (D.I. 693) (the “August 24 Status Report”);

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<sup>1</sup> All citations to the docket are to the *Crystallex* case docket (Misc. No. 17-151), unless otherwise noted.

WHEREAS, on January 8, 2024, the Court issued a *Memorandum Order* (D.I. 838), designating all creditors who had, by that date, obtained a conditional or unconditional writ of attachment *feri facias* against the PDVH shares owned by PDVSA as Additional Judgment Creditors;

WHEREAS, on January 24, 2024, the Court further designated Altana Credit Opportunities Fund SPC, Altana Credit Opportunities Fund 1 SP, and Altana Funds Ltd. Cayman (collectively, “Altana”) as Additional Judgment Creditors (*see* D.I. 902 at 12);

WHEREAS, on February 27, 2024, the Court issued an *Order* (D.I. 990) granting the Special Master’s *Motion Requesting Amendment of Certain Priority Arrangement Procedures* (D.I. 928) (the “Procedures Motion”) and adopting the Special Master’s proposed amendments to the Priority Arrangement Procedures therein (the “Amended Priority Arrangement Procedures”);

WHEREAS, the Amended Priority Arrangement Procedures provide that, after receipt of an Updated Steps Chart (as defined in the Procedures Motion) from the Special Master, the Court will issue an order (the “Priority Order”) stating the relative priority of judgments held by Crystallex Corporation (“Crystallex”) and each Additional Judgment Creditor;

WHEREAS, the Special Master submitted a Steps Chart (D.I. 994) on February 29, 2024 (the “February Steps Chart”) setting out the order of priority for each Attached Judgment based on the date the applicable judgment holder moved for a writ of attachment that was eventually granted;

WHEREAS, on March 1, 2024, the Court issued the Priority Order (D.I. 996);

WHEREAS, following the issuance of the Priority Order, Crystallex and each Additional Judgment Creditor have submitted their respective Proposed Writ Packages (as defined in the Priority Order) to the Clerk and thereafter filed an affidavit on the *Crystallex* case docket (Misc.

No. 17-151) as required by the Priority Order;

WHEREAS, the Amended Priority Arrangement Procedures provide that, following the second business day from the issuance of the Priority Order, the Court will issue an order (the “Writ Order”) that, among other things, directs the Clerk to issue a writ of attachment for each Additional Judgment Creditor on the PDVH share certificate conditioned by the order of priority set by the Court in the Priority Order;

**NOW, THEREFORE, IT IS HEREBY ORDERED** that

1. The conditions on the issuance and service of each Additional Judgment Creditor’s writ of attachment *feri facias* against the PDVH shares owned by PDVSA have been satisfied.
2. The Clerk is directed to affix her original signature and seal on the proposed writs of attachment filed by Crystallex and each Additional Judgment Creditor.
3. On **March 27, 2024 at 10:30 a.m.**, Crystallex and all Additional Judgment Creditors shall convene at **Courtroom 4A** in the J. Caleb Boggs Federal Building, 844 North King Street, Wilmington, DE 19801-3519. At that time and location, under the supervision and direction of the Court and the Special Master, Crystallex and each Additional Judgment Creditor shall deliver to the U.S. Marshal, in accordance with the order set forth in the Priority Order, two (2) complete “Service Packages” and a certified or bank check for \$130 addressed to the U.S. Marshal for the District of Delaware. Each Service Package shall contain: (a) two (2) certified copies of the applicable writ, (b) one (1) copy of the Priority Order, (c) one (1) copy of the Writ Order, (d) one (1) copy of the applicable judgment, and (e) three (3) copies of Form USM-285. Additional Judgment Creditors having the same priority set forth in the Priority Order will be deemed and declared to have delivered their respective Service Packages to the U.S. Marshal at the same time, notwithstanding any minor differences in time stamps confirming their deliveries.



4. Within one (1) business day after completing delivery of the Service Packages and payment to the U.S. Marshal, Crystallex and each Additional Judgment Creditor shall file on the *Crystallex* case docket (Misc. No. 17-151) an affidavit attesting to delivery of the Service Packages and payment to the U.S. Marshal and providing (a) a description of the documents delivered, including the number of copies of each, (b) the date, time, and location of delivery, and (c) the name of the individual accepting delivery.

IT IS SO ORDERED this 7<sup>th</sup> day of March, 2024.

A handwritten signature in blue ink, appearing to read 'L. P. Stark', is written over a horizontal line.

HONORABLE LEONARD P. STARK  
UNITED STATES DISTRICT COURT